

ATTORNEYS AT LAW
20 VESEY STREET, SUITE 1200
NEW YORK, NEW YORK 10007
(212) 732-0002 • FAX (212) 293-7224

MARK I. COHEN
PETER M. FRANKEL
LOUIS J. RUGGIERO
MINA KENNEDY
GILLIAN M. FEEHAN*
*ADMITTED IN NJ AND PENDING ADMISSION IN NY

35-07 90TH STREET
JACKSON HEIGHTS, NEW YORK 11372
(718) 898-4900 • FAX (718) 898-0093
PLEASE DO NOT REPLY TO THIS OFFICE

July 28, 2020

VIA ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

**Re: *United States v. Ricardo Reynoso*
19 Cr. 735 (KPF)**

Dear Judge Failla:

Please recall that I represent Mr. Ricardo Reynoso in his defense of the above-referenced matter, which is presently scheduled for sentencing before Your Honor on August 14, 2020, at 3:00 p.m. With the consent of the Government and for the reason that follows, the defense respectfully requests a 45-day adjournment of sentencing. This is the first such request by the defense and is attributable to delays caused by the COVID-19 outbreak.

The requested adjournment is necessitated by the parties' inability to date to conduct a suitable safety valve proffer in order to move Mr. Reynoso's case forward. On July 27, 2020, the parties agreed to conduct a remote video proffer in the next two weeks between the Government, defense counsel from my office, and Mr. Reynoso from his home in Massachusetts, where he continues to live under his conditions of pre-trial supervision without incident.

The defense is confident that the case will not require any further delays once we are able to conduct the proffer. We submit that the proposed 45-day adjournment will permit the parties to address and comply with the Court's rules of practice regarding the submission of sentencing memorandum, and will also serve the Court's interest in keeping its calendar as free as possible to prioritize the cases of incarcerated persons.

Respectfully submitted,



Mark I. Cohen

MIC/ya

Cc: A.U.S.A. Ryan Finkel (via ECF)
Mr. Ricardo Reynoso (via email)

Application GRANTED. The sentencing hearing currently scheduled for August 14, 2020, is hereby ADJOURNED to October 16, 2020, at 3:00 p.m. in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York.

Dated: July 28, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE